

25. The total impact to all waters of the U.S. (permanent and temporary) resulting from the proposed project is a key element of the Corps' review of the permit application. The waters of the U.S. impacts information will also be disseminated for public comment through the Corps public notice process. Page 176 of the application states that 16.57 miles of pipeline have not been field surveyed. Please describe the plan and schedule for (a) surveying these areas, and, (b) quantifying the aquatic impacts. Please be advised that all impacts to waters of the U.S. must be quantified (or appropriately estimated) and described prior to the Corps issuing a public notice for the project.

AES RESPONSE: AES's response to FERC Comment SWW10 included in the responses to FERC's April 5, 2007 Environmental Data Request discusses the methodology that will be used to quantify the 16.57 miles of pipeline that have not been field surveyed. Field surveys of the 16.57 miles will be conducted as described in the Response to Specific Comment No. 1, in Attachment B of the Revised Application for U.S. Army Corps of Engineers Section 404/10- Permit submitted on April 13, 2007. As described in the responses, AES has performed initial field surveys of the Pipeline Route; however, as is common in pipeline and infrastructure siting projects, access has not been granted by individual property owners for the entire Pipeline Route. In recognition that complete access by all individual property owners for pipeline projects is, in reality, an impossibility, ACOE practice has been to accept field surveys less than 100 percent with a goal of reaching at least 80 percent. For the proposed Pipeline Route, AES has gained access permission for approximately 88 percent of the areas proposed to be crossed.

The stream crossings and wetland areas that were identified as "TBD" are all on properties where our survey crews could not gain access, In these inaccessible areas, AES reviewed background information including National Wetlands Inventory Maps, USGS Maps, and USDA SCS Soil Surveys to identify the approximate locations and extent of wetlands. The impacts to wetlands and streams that occur in these areas and the area calculations were determined by available remote sensing data and desktop analysis. AES conservatively estimated the potential impacts to these areas based on a typical project ROW crossing footprint, and included those quantifications in the revised Tables 2.4-1 and 2.5.1-1 contained in Attachment ACOE 25 to this response. Because it is not possible to conclusively determine the crossing method until an on-ground field survey is performed, AES assumed utilization of one of the standard FERC-approved methods for crossing these resources in the estimation on the tables, and will confirm the viability of the crossing method once the sites have been visited and the appropriate method can be assigned.

Following issuance of the FERC certification, AES will complete landowner agreements and obtain access to the properties. At that time the impacts to aquatic areas will be revised and resubmitted to the FERC and the ACOE. Appropriate mitigation measures will be updated as well.